

Passaic, Hackensack and Newark Bay Remediation Branch Weekly Report
April 29, 2020
Enforcement Confidential

RA or DD updates for the week of April 27, 2020:

Hot Issues:

Past Week:

Upcoming:

Regional Administrator's Pending Action Items:

<u>Subject</u>	<u>Date Sent to RA's Office</u>	<u>Required By/Due Date</u>	<u>Comments</u>

Other Items of Special Interest:

Non-RA Highlights:

Events List:

<u>Event Name</u>	<u>Start Date</u>	<u>End Date</u>	<u>Region</u>	<u>Event Type</u>	<u>Description</u>	<u>City</u>	<u>State</u>

Milestone Tracker:

<u>Site</u>	<u>Milestone</u>	<u>Project Manager</u>	<u>Projected Date</u>
Diamond Alkali OU4	PRAP	Diane Salkie	2020/4
Pierson's Creek OU2	ROD	Pam Tames	2021/1
Riverside Industrial Park	ROD	Josh Smeraldi	2020/4

Diamond Alkali OU1 (Lister Avenue):

- Groundwater sampling
 - Submittal of 2019 Annual Groundwater Report, Groundwater Sampling Event No. 10, and GWWS Update/Hydraulic Gradient Update – Estimated 6/1/20.
- Remedy Evaluation
 - Submittal of Site Evaluation Report Addendum – 4/30/20.
 - Submittal of Revised Remedy Evaluation Report – 6 weeks from approval of Site Evaluation Report Addendum.
- GSH continues to update the NJPDES Permit Equivalent coordinating with NJDEP on proposed discharge limits for influent/effluent sampling.

- GSH submitted and revised and updated DASS Operation and Maintenance QAPP for EPA review and approval. QAPP under review by EPA.
- Coordination meeting with GSH and WSP 4/28/2020
- Completed draft OU1 oversight bill

Diamond Alkali OU2 (8.3 miles):

- Comments on all but one appendix of the Pre-Design Investigation report have been sent to Occidental-Glenn Springs. The last appendix is still under review.
- Exemption 5, Attorney-Client Communication, Attorney Work Product; Exemption 7 (a), Enforcement

Diamond Alkali OU3 (Newark Bay Study Area):

- GSH submitted Lower 8-mile remediation schedule from GSH, revised schedule is under review by EPA to start no action run
- GSH submitted revised NBSA RI/FS schedule, including peer review of bioaccumulation model
- Sent GIS file used for memo boundary figures with proposed OU2-OUS boundary to GSH
- Received NBSA CSTAG's revised memo on 4/22, memo is under review and EPA team working on preparing responses
- PRG-RAO comment clarification meeting with GSH scheduled for 4/29
- Completed draft of OU3 oversight bill

Diamond Alkali OU4 (17-Mile):

- Held a call with NJDEP and EPA team to discuss the statistical framework for interim remedy completion sampling.
- Held FS meeting #28 on April 23rd where we discussed:
 - Dredge to Clean
 - Decision Tree comments and weighting the lines of evidence
 - Assessing potential remaining sources after IR (EPA presentation)
 - Footnote for RM 15 to Dundee Dam comments (EPA presentation)
- Completed the first draft of the oversight bill for OU 4.
- Set up FS meeting #29 for April 30.
- Completed the slides for the upcoming CAG meeting

Universal Oil Products:

- RD Order concurred on. Sent to Honeywell for signature. They came back with a concern. We will adjust order and resend.
- Annual cap maintenance and observation to occur mid-May.
- Need to send past cost bill within 3 weeks.

Berry's Creek Study Area:

- Need to clarify COCs that design will work with (important for integration with UOP). Drafted letter. Should go out Wednesday.
- BCSA Group geotechnical borings should happen next week. Surveying may begin next week as well, coordinating with the LiDAR flyover. Health and Safety Plans have been updated to account for coronavirus.

- Laboratory has informed RD team that they will not be able to complete all Treatability Study tasks due to shut down for coronavirus.
- BCSA Group preparing memo regarding erosion concerns from RBD discharge. Will send to RBD team when received.
- RD Primer “Meeting” scheduled for May 5/6.
- Need to send oversight bill within 3 weeks.

Ventron/Velsicol:

- Document on summary of building on Undeveloped Portion of the site to be reviewed by 2nd week in May.
- **Exemption 5, Deliberative/Pre-decisional**
[REDACTED]
- Jay Steinberg (Fruit of the Loom bankruptcy trustee) requested releasing a portion of the funds from the Trust for other projects that required money. ORC gathered some information and is preparing a response.
- Randolph property (adjacent to site) drainage has been reworked, and now occasionally floods Ventron site. Had discussion with property owner and PRP representatives on site.
- Need to review:
 - 2018 Annual Report
- **Exemption 5, Deliberative/Pre-decisional; Attorney-Client Communication**
[REDACTED]

Standard Chlorine:

- RD/RA: Sent comments on 95% RD to PRPs on April 24 (received NJDEP comments on April 22; no new ARARs identified).
- O&M: Ongoing.
- Sent reply email to Anthony Pilawski, Section Chief, Bureau of Pretreatment and Residuals, on April 22; received same day reply that he believes no 121e permit exemption for residuals and will be seeking NJDEP legal opinion. Continuing to discuss with ORC.
- Redevelopment:
 - Pre-Design Investigation - update to HASP with COVID-19 precautions submitted on April 15. field work tentatively scheduled for mid-May (2-week postponement due to COVID-19, may be postponed further due to pandemic conditions in NJ).
 - Next redevelopment plan anticipated to be submitted is sewer/water; scope of work currently in discussions among HCIA/Morris, Kearny Municipal Utilities Authority, and NJ Transit.
 - Reviewed ORC draft comfort letter to Morris, which was sent to Eric W for review.

Pierson's Creek:

- Received the draft RI for OU2 on 9/23/19. The BHHRA was submitted on 10/31/19. On 3/24/20, Geosyntec submitted the revised combined RI and BHHRA. It is currently under review. Their latest schedule has Troy submitting the draft FS on 5/29/2020.

- Troy sent a letter on 4/15/20 focusing on EPA's approach and would like to meet with EPA to discuss the schedule. Their schedule now estimates a December ROD. HQ (Steven Cook) was also copied on the letter. A draft letter is circulating for review as of 4/28/20.
- Received the Candidate Technologies memo for OU2 also on 8/1. Response letter was sent on 9/26/19. A RTC letter was received on October 31st. A call was held with Geosyntec and CDM/EPA to discuss and finalize the list of alternatives for the FS on 12/17/19. EPA's comments on the revised Tech Memo were sent on 2/7/20. Received NJDEP comments on the Tech memo on 3/9/20 (comments were requested by early January 2020). Reviewing DEP's comments to determine if another comment letter is necessary.
- Received the draft SOW and AOC back from 429 Delancy on 9/17/19. A call was held with 429 Delancy on 11/20. Received the latest draft AOC from Amelia on 3/24 for review. 429 Delancy is not happy with this latest revision and is preparing a response.
- Gave the go-ahead to Koechley to finalize the SCORPIO\$ report for the OU2 invoice on 4/14/20. The updated letter and narrative are in concurrence as of 4/21/20.
- The future buyer of the Globe property performed construction on the site and dug up the unnamed tributary adjacent to Globe and replaced it with piping and drainage features. In a letter dated 2/14/20 from Salomone Bros, a meeting at the site was requested with EPA to discuss additional work that they would like to perform on the Troy property to move their easement. The Oberwill and Salomone notice letters were sent out on 4/20/20. CDM will assess the soil stockpiles on 5/4/20.
- Working on the RAF contracting reviews for the OU1 FS work.

Riverside Industrial Park:

- EPA approved the final versions of the RI, BHHRA, and the SLERA on 4/21.
- We received a draft FS on 4/27 and we expect to provide PPG comments on the draft FS on May 18th. Also, we are tentatively planning a presentation by PPG on the draft FS on May 11th to EPA staff and NJDEP.
- We are preparing a community involvement plan to coincide with the release of the proposed plan this summer.